

WALTER E. KEENEY

VS.

LULA I. EICHELBERGER, Widow

and

PAULINE E. KEENEY, KEGLEY, and
JAMES KEGLEY, her husband

NO. 21,950 EQUITY

IN THE CIRCUIT COURT FOR

FREDERICK COUNTY, MARYLAND

PETITION FOR DECREE PRO CONFESSO

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Petition of Walter E. Keeney, Complainant in the above entitled proceedings, by William W. Wenner, Rollins and Wenner, and E. Austin James, his Solicitors, respectfully shows unto your Honors:

FIRST: That on or about the 18th day of March, 1968, he filed his Bill of Complaint herein, together with Exhibits, praying that your Honors might appoint a Trustee or Trustees for the Sale of the Real Estate and improvements therein described, and to divide the proceeds therefrom under the direction of your Honors to the parties entitled thereto according to their respective interests, after the payment of the usual Court costs and expenses attendant to such a sale; that thereafter, summons was issued by your Honorable Court, directed to the Respondents therein named, requiring them to answer thereto within the time limited by law, beginning on the first Monday of April, 1968, and ending fifteen (15) days thereafter.

SECOND: That it would appear that each and every one of the Respondents named therein was duly summoned by the Sheriff for Frederick County, Maryland, and that the Return of the Sheriff thereon was filed on March 22, 1968; that the time limited in the aforesaid subpoena to plead and answer has now expired and that no appearance has been entered by any of the Respondents, either in person or by Solicitor, nor has any of them filed an answer, pleading or defense herein.

WHEREFORE, your Petitioner prays that

1. That the Bill of Complaint may be taken Pro Confesso against the said Defendants, Lula I. Eichelberger, Widow, Pauline E. Keeney Kegley and James Kegley, her husband, in accordance with Maryland Rule 310 (b) Maryland Rules of Procedure.